## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

MARY PHILLIPA SLEDGE, MARY JANE PIDGEON SLEDGE TRUST, and PIDGEON SLEDGE FAMILY LIMITED PARTNERSHIP,

Plaintiffs,

v.

Case No. 2:13-cv-2578-STA-cgc

INDICO SYSTEM RESOURCES, INC. and CLEAL WATTS, III,

Defendants.

## PLAINTIFFS' MOTION FOR ATTORNEY'S FEES

Come now Plaintiffs' Mary Phillipa Sledge, Mary Jane Pidgeon Sledge Trust, and Pidgeon Sledge Family Limited Partnership ("Plaintiffs") and, pursuant to TENN. CODE ANN. § 47–18–109(e)(1) and Order of this Court, move this Court to award Plaintiffs \$215,580.83 as a reasonable attorneys' fee. In support hereof and filed contemporaneously herewith, Plaintiffs file their Memorandum of Law, declarations of Darrell Phillips and Robert L. Crawford, as well as a spreadsheet listing hours, fees and expenses charged for each aspect of this litigation (as required by Local Rule 54.1(1)).

Respectfully Submitted,

/s/ Darrell N. Phillips\_

PIETRANGELO COOK PLC Anthony C. Pietrangelo BPR # 15596 John J. Cook BPR # 17725 Darrell N. Phillips BPR #30299 6410 Poplar Avenue, Suite 190 Memphis, TN38119

901.685.2662 901.685.6122 (fax) dphillips@pcplc.com Attorneys for Plaintiffs

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 10th day of March, 2016, a copy of the foregoing electronically submitted document was served on the parties listed below via first class mail, postage prepaid, unless said party is a registered CM/ECF participant who has consented to electronic notice, and the Notice of Electronic Filing indicates that Notice was electronically mailed to said party.

Cleal Watts, III Indico Systems Resources, Inc. 8926 Forest Hills Blvd. 8926 Forest Hills Blvd. Dallas, TX 75218 Dallas, TX 75218

/s/ Darrell N. Phillips